IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

ASSOCIA	TFD	RECO	VFRV	\mathbf{IIC}
ABBULIA	ULU	NECO	Y LIXI .	

Plaintiff,

No. 2:16-cv-126-JRG-RSP

v.

LINDA BUTCHER ET AL.,

Defendants.

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CONSOLIDATED REPLY IN SUPPORT OF MOTION TO DISMISS (DKT. 94)

Defendants Quinn Veysey; Priveco, Inc.; Virtual Investments, LLC; Telepathy, Inc.; Strong, Inc.; Adam Strong; Creation Media, LLC; Unicorn Ranch, LLC (in lieu of Onig, LLC); True Magic, LLC; CBRE Group, Inc.; Power Home Technologies, LLC; State Farm Mutual Automobile Insurance Company; Tumult, Inc.; Radical Investments Management, LLC; and Slice Technologies, Inc. (collectively, "Defendants"), respectfully request an additional seven days, until and including October 6, 2016, to file their consolidated reply in support of their consolidated motion to dismiss (Dkt. 94).

The Court previously approved, with Plaintiff's consent, a single deadline for the fifteen Defendants listed above to respond to Plaintiff's operative complaint. Dkt. 71. Defendants thereafter filed a consolidated motion to dismiss, or in the alternative transfer. Dkt. 94. Plaintiff filed its opposition on Monday, September 19. Dkt. 102. Reply briefing is presently due Thursday, September 29.

¹ Defendant Electronic Arts Inc. subsequently joined Defendants' consolidated motion. Dkt. 99.

Defendants request this extension so that each listed Defendant and its counsel together have sufficient time to further coordinate a consolidated reply. This will reduce the time needed to review and decide the issues addressed therein, and reduce Plaintiff's briefing burden. Plaintiff has agreed to this extension.

Defendants therefore request an extension of seven days. Defendants seek this extension of time not for delay but for good cause and so that justice may be served.

A proposed Order accompanies this Unopposed Motion.

Dated: September 23, 2016 Respectfully submitted,

> By: /s/ Joel C. Boehm Joel Christian Boehm

WILSON SONSINI GOODRICH & ROSATI 900 South Capital of Texas Hwy Las Cimas IV, Fifth Floor Austin, TX 78746-5546 T: (512) 338-5400

iboehm@wsgr.com Counsel for Slice Technologies, Inc.

By: /s/ Steven M. Geiszler

Steven M. Geiszler Texas Bar No. 24032227 DENTONS US LLP 2000 McKinney Avenue, Suite 1900 Dallas, Texas 75201-1858 T: (214) 259-0951 steven.geiszler@dentons.com Counsel for Creation Media, LLC; Unicorn

Ranch, LLC (successor to Onig, LLC); Adam Strong; Strong, Inc.; True Magic, LLC; and Virtual Investments, LLC

By: /s/ Bobby Lamb

Bobby Lamb GILLAM & SMITH 303 S. Washington Avenue Marshall, Texas 75670 T: (903) 934-8450 wrlamb@gillamsmithlaw.com Counsel for Power Home Technologies, LLC By: /s/ M. Scott Fuller

Michael Scott Fuller LOCKE LORD LLP 2200 Ross Avenue, Suite 2800 Dallas, TX 75201 T: (214) 740-8000 sfuller@lockelord.com Counsel for CBRE Group, Inc.

By: /s/ Brian H. Pandya

Brian H. Pandya
WILEY REIN LLP
1776 K Street NW
Washington, DC 20006
T: (202) 719-7457
bpandya@wileyrein.com
Counsel for Telepathy, Inc.

By: /s/ R. William Beard, Jr.

R. William Beard, Jr.
SLAYDEN GRUBERT BEARD PLLC
401 Congress Avenue, Suite 1900
Austin, Texas 78701
T: (512) 402-3556
wbeard@sgbfirm.com
Counsel for State Farm Mutual Automobile
Insurance Company

By: /s/ Franklin M. Smith

Franklin M. Smith DICKINSON WRIGHT PLLC 2600 W. Big Beaver Rd., Suite 300 Troy, Michigan 48084 T: (248) 433-7393 fsmith@dickinsonwright.com Counsel for Priveco, Inc.

By: /s/ Jennifer P. Ainsworth

Jennifer P. Ainsworth
WILSON, ROBERTSON & CORNELIUS, P.C.
909 ESE Loop 323, Suite 400
Tyler, Texas 75701
(903) 509-5000 Main
(903) 509-5092 Fax
jainsworth@wilsonlawfirm.com
Counsel for Tumult, Inc.

By: /s/ Darin M. Klemchuk

Darin Michael Klemhuck
KLEMCHUK LLP
Campbell Centre II
8150 North Central Expressway, 10th Floor
Dallas, Texas 75206
T: (214) 367-6000
darin.klemchuk@klemchuk.com
Counsel for Radical Investments Management

Counsel for Radical Investments Management, LLC

By: <u>/s/ Mark Levine</u>

Mark Levine
WEYCER, KAPLAN, PULASKI & ZUBER P.C.
11 Greenway Plaza, Suite 1400
Houston, Texas 77046
T: (713) 961-9045
mlevine@wkpz.com
Counsel for Quinn Veysey

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendant has complied with the meet and confer requirement in Local Rule CV-7(h). This motion is unopposed.

/s/: Joel C. Boehm

Joel C. Boehm

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service and are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 23, 2016.

/s/: Joel C. Boehm

Joel C. Boehm